

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF MISSOURI

CENTRAL DIVISION

MARK PAUL REYNOLDS

PLAINTIFF

V.

CASE NO: 20-4081-CV-C-MDH

MU HEALTHCARE

DEFENDANTS

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**PLAINTIFF'S RESPONSE TO:**

**THE MUHC DEFENDANTS' SUGGESTION IN SUPPORT OF**

**THE INDIVIDUALLY NAMED MUHC DEFENDANTS'**

**MOTION TO QUASH SERVICE AND TO DISMISS, AND**

**IN THE ALTERNATIVE TO MAKE MORE DEFINITE**

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NOW COMES, PLAINTIFF MARK PAUL REYNOLDS PROSE (MR. REYNOLDS)

WITH HIS RESPONSE TO THE MUHC DEFENDANTS'; **THE INDIVIDUALLY  
NAME MUHC PERSON DEFENDANTS':** MOTION TO QUASH SERVICE;

**THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS':**

**MOTION TO DISMISS; THE INDIVIDUALLY NAMED MUHC PERSON  
DEFENDANTS': MOTION IN THE ALTERNATIVE TO MAKE MORE DEFINITE;**

**THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS':**

**SUGGESTION IN SUPPORT OF;**

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**SEE; THE SAID MISREPRESENTED ATTORNEYS' ANTICS ADMITTED**

**ARE ATTEMPTING TO TRY THIS CASE BY MOTIONS TO DISMISS;**

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**THIS ACTION IS FOR RELIEF OTHER THAN JUST MONEY DAMAGES;**

**FROM MUHC'S DUTY BREACHES OF NONDISCRETIONARY DUTIES  
WITHOUT OBSERVANCES OF PROCEDURES REQUIRED BY FEDERAL LAWS;**

**THE CONSPIRATORS' AND THE CO-CONSPIRATORS' CONSPIRACIES**

**VIOLATIONS OF MR. REYNOLDS' HUMAN DIGNITIES AND**

**HUMAN RIGHTS VIOLATIONS HAS VIOLATED**

**U.N. INTERNATIONAL HUMAN RIGHTS TREATY OF MAY 3 2008**

**OF THE U.N. CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES**

***SEE; RECOGNITION BEFORE THE LAW AND LEGAL CAPACITY ARTICLE 12***

***SEE; ACCESS TO JUSTICE ARTICLE 14 AND PARTICIPATION RIGHTS***

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*SEE; RIGHT TO HEALTH ARTICLE 25 SPECIFIES THAT “PERSONS WITH DISABILITIES HAVE THE RIGHT TO THE ENJOYMENT OF THE HIGHEST ATTAINABLE STANDARDS OF HEALTH WITHOUT DISCRIMINATION;*

*SEE; PROTECTING THE INTEGRITY OF PERSON ART 17 STATES THAT EVERY PERSON WITH DISABILITIES HAS A RIGHT TO RESPECT FOR HIS OR HER PHYSICAL AND MENTAL INTEGRITY ON A EQUAL BASIS WITH OTHERS.*

MR. REYNOLDS SPECIFICALLY DENIES DEFENDANTS PLEADINGS OF SPECIAL MATTERS OF MOTIONS TO DISMISS: JUSTISDICTION AND IMMUNITY, SOVEREIGN IMMUNITY, IMPROPER SERVICE, F.R.C.P. RULE 9, 12, 26, ETC;

CITING RULE 9 PLEADING SPECIAL MATTERS

(a) CAPACITY OR AUTHORITY TO SUE; (1) (A) (B) (C) (2) RAISING THOSE ISSUES, **A PARTY MUST DO SO BY A SPECIFIC DENIAL,**

**WHICH “MUST STATE ANY SUPPORTING FACTS”**

**THAT ARE PECULIARY WITHIN “THE PARTY’S KNOWLEDGE”;**

CITING RULE 12 (b) RESULT OF PRESENTING MATTERS OUTSIDE THE PLEADINGS... ***ALL PARTIES MUST BE GIVEN A REASONABLE OPPORTUNITY TO “PRESENT ALL THE MATERIAL THAT IS PERTINENT TO THE MOTION”;***

CITING RULE 26 (d) NO DISCOVERY WHATSOEVER ALLOWED IN ANY CASE  
UNTIL PARTIES MEET AT A DISCOVERY CONFERENCE;

**MR. REYNOLDS CITING; RULE 26, 12**

**PARTY TO PRESENT ALL THE MATERIAL THAT IS PERTINENT TO  
MOTION; DISCOVERY NEEDED;**

**RULE 9 PARTY MUST STATE ANY SUPPORTING FACTS WITHIN PARTY'S  
KNOWLEDGE; DISCOVERY NEEDED;**

**FAILURE TO STATE CLAIM *THIS STANDARD "SIMPLY CALLS FOR  
ENOUGH FACTS TO RAISE A REASONABLE EXPECTATION THAT  
DISCOVERY WILL REVEAL EVIDENCE OF [THE CLAIM]"*.**

***TWOMBLY, 550 U.S. AT 556***

MR. REYNOLDS CAN NOT PROPERLY RESPONSE TO

**(THE INDIVIDUALLY MUHC PERSONS DEFENDANTS' MOTIONS)**

CITING RULE 26 DISCOVERY IS REQUIRED AND NEEDED;

**IN CONSPIRACIES OF "PROFILING" MR. REYNOLDS DISABILITIES;**

***DECLARATION OF A CO-CONSPIRATOR CAN BE INTRODUCED AGAINST  
DEFENDANT TO SHOW THE PARTICIPATION IN A CONSPIRACY,***

***STATE V JENNINGS 815 S.W. 2d 434 (MO.APP. E.D. 1991)***



**THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS ENGAGED IN CONSPIRACIES OF DISCRIMINATORY PRACTICES OF INTERFERENCE: WITH MR. REYNOLDS' LAWFUL RIGHTS OF HUNTING, FISHING OR TRAPPING; IN RSMO 578.151, 152 VIOLATIONS,**

**THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS ENGAGED**

**IN CONSPIRACIES OF DISCRIMINATORY PRATICES AGAINST:**

THE HUMAN DIGNITY OF (MR.REYNOLDS) A S.S.A. DISABLED PERSON

**THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS ENGAGED**

**IN CONSPIRACIES OF DISCRIMINATORY PRACTICES AGAINST:**

MR. REYNOLDS' FUNDAMENTAL RIGHTS IN VIOLATIONS OF MR. REYNOLDS' CIVIL RIGHTS AS SAID RIGHTS ARE SECURED BY SAID STATUTES AND CONSTITUTIONS OF THE STATE OF MISSOURI AND THE UNITED STATES

IN THE UNCONSTITUTIONAL, UNLAWFUL, DISCRIMINATORY PATTERNS AND PRACTICES OF PREJUDICES OF HARASSMENTS BY LIBEL USE OF PUBLIC RECORDS OFFENSES AGAINST MR. REYNOLDS TO DISFRANCHISE, TO DEPRIVE, A DISABLED HANDICAP CITIZEN'S FIREARMS RIGHTS; IN BREACH OF HIS WORKERS' COMPENSATION PATIENT'S PRIVACY RIGHTS;

**IN THE PUBLIC RECORDS OF CRM 1872 OFFENSES**

**IN CONSPIRACIES OF “PROFILING” MR. REYNOLDS’ DISABILITIES;**

A WORKERS’ COMPENSATION, S.S.A. DISABLED INDIGENT PATIENT’S  
WORK RELATED TRUMA INJURIES, RECOVERY, AND RECOVERY  
TREATMENTS;

**THE INDIVIDUALLY MUHC PERSONS DEFENDANTS:** LISTED AS  
DEFENDANTS ON COMPLAINT HAS **USED MARK PAUL REYNOLDS**  
**IDENTITY** IN THE RECORDS THAT HAS TRIGGERED AND IS PRODUCING  
HARMFUL ADVERSE EFFECTS TO MARK PAUL REYNOLDS;

**WITH MALICE OR WITH RECKLESS INDIFFERENCE TO MR. REYNOLDS’**

**U.S. CITIZEN FEDERAL RIGHTS;**

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**(ADVERSELY AFFECT FEDERAL TITLE 18 U.S.C. 922 PROCEEDINGS)**

***CHAPTER 151 DECLARATORY JUDGEMENTS***

***ANY SUCH DECLARATION SHALL HAVE THE FORCE AND EFFECT OF A  
FINAL JUDGEMENT DECREE AND SHALL BE REVIEWEDABLE AS SUCH.***

SEE; TITLE 42 CFR (PART 2) AND 2.13 (A)..... MAY NOT OTHERWISE BE DISCLOSED OR USED IN ANY CIVIL, CRIMINAL, ADMINISTRATIVE, OR LEGISLATIVE PROCEEDINGS CONDUCTED BY ANY FEDERAL, STATE, OR LOCAL AUTHORITY...; AND (b) UNCONDITIONAL COMPLIANCE REQUIRED: (C) ACKNOWLEDGING THE PRESENCE OF PATIENTS:

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**IN TITLE 5 U.S.C. SEC. 552a (PRIVACY ACT- IMPROPER DISSEMINATION)**

**WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY LAW**

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**ON MUHC DEFENDANTS' JUDICIAL GHOSTED DETAINEE;**

**MARK PAUL REYNOLDS**

**MUHC DETAINED MR. REYNOLDS FOR 11 DAYS WITH NO ATTORNEY**

**THERE IS NO JUDICIAL RECORDS “AUTHORIZING” FOR THE USE OF**

**MR. REYNOLDS IDENTITY REQUIRED BY FEDERAL LAW;**

**THERE IS NO JUDICIAL PUBLIC LAW 110-180 RECORDS;**

**THERE IS NO JUDICIAL TITLE 42 CFR PART 2, 18 U.S.C. 245 RECORDS;**

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**THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS ENGAGED**

**IN CONSPIRACIES OF DISCRIMINATORY PRACTICES**

***“IF A DOCTOR SIGNS SOMETHING SAYING THE THAT POLICE CAN GO INTO THE PT’S HOME AND REMOVE WEAPONS,”***

AGAINST MR. REYNOLDS’ FUNDAMENTAL RIGHTS

***SEE; DISTRICT OF COLUMBIA VS. HELLER, 128 S.CT.2783 (2008)***

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IN VIOLATIONS OF THE U.S. DICK ACT OF FEBRUARY 21, 1902

**CITIZEN’S RIGHTS OF MILTIA HOME RULE**

THE TERM THIS GIVES THE RIGHT OF SELF-GOVERNMENT

THAT IS GRANTED TO A BODY WITHIN A STATES BORDERS;

THE 1902 DICK ACT SUMMARIZED: ***ALL MEMBERS OF THE UNORGANIZED MILTIA HAVE ABSOLUTE PERSONAL RIGHT AND THE SECOND AMENDMENT RIGHT TO KEEP AND BEAR ARMS OF ANY TYPE AND AS MANY THEY CAN AFFORD TO BUY;***

THE 1902 DICK ACT CANNOT BE REPEALED.

**MR. REYNOLDS SPECIFICALLY DENIES**

**SPECIAL MATTERS OF JUSTISDICTION TO MAKE MORE DEFINITE**

IN RESPONSE MR. REYNOLDS CITES:

**WHERE DEFAMATORY STATEMENT WAS DURING FBI INVESTIGATION**



STATUTE OF LIMITATIONS FOR SLANDER BEGINS TO RUN, NOT WHEN DEFAMATORY STATEMENT WAS MADE, BUT WHEN DAMAGE ARE ASCERTAINED; *THURSTON V BALLINGER* 884 S.W.22d (MO, APP.W.D.)

28 U.S.C. 1331 FEDERAL QUESTION

THE DISTRICT COURT SHALL HAVE ORIGINAL JURISDICTION OF ALL CIVIL ACTIONS ARISING UNDER CONSTITUTION, LAWS OR TREATIES OF THE UNITED STATES.

42 U.S.C. 1983

EVERY **PERSON** WHO UNDER COLOR OF ANY STATUTE, ORDINANCE, REGULATION, CUSTOM, OR **USAGE**, OF ANY STATE OR TERRITORY OR THE DISTRICT OF COLUMBIA, **SUBJECTS**, OR **CAUSE TO BE SUBJECTED**, **ANY CITIZEN OF THE UNITED STATES** (MR. REYNOLDS) OR OTHER PERSON WITHIN THE **JURISDICTION THEREOF TO** DEPRIVATION OF ANY RIGHTS, PRIVILEGES, OR IMMUNITIES SECURED BY THE CONSTITUTION AND LAWS, **SHALL BE LIABLE TO THE PARTY INJURED** (MR. REYNOLDS) IN AN ACTION AT LAW, SUIT IN EQUITY, OR OTHER PROPER PROCEEDING FOR REDRESS;

DECLARATORY, INJUNCTIVE RELIEF IS REQUIRED **TWO DECLARATORY DECREES** HAVE BEEN VIOLATED.

INVOKES 1871 CIVIL RIGHTS ACT WHEN STATE ACTOR VIOLATES

FEDERALLY GUARANTEED RIGHTS.

5 U.S.C. 552a, 42 U.S.C. 1988 PROCEEDING IN VINDICATION OF CIVIL RIGHT,

5 U.S.C. 702- RIGHT OF REVIEW, TITLE 42 CFR PART 2, PUBLIC LAW 110-180

42 U.S.C. 1981 EQUAL RIGHTS UNDER LAW

28 U.S.C. 1331 FEDERAL QUESTION

THE DISTRICT COURT SHALL HAVE ORIGINAL JURISDICTION OF ALL CIVIL ACTIONS ARISING UNDER CONSTITUTION, LAWS OR TREATIES OF THE UNITED STATES.

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**MR. REYNOLDS HAS A TITLE 5 U.S.C. 552a, 42 U.S.C.1983 RIGHT TO**

**OBTAIN THE RECORDS, INFORMATION, DATA AND**

**JUDGEMENTS OF RELIEF HE SEEKS;**

**SEE; TITLE 5 U.S.C. 552a (g) CIVIL REMEDIES (C) FAILS TO MAINTAIN ANY RECORD CONCERNING ANY INDIVIDUAL WITH SUCH ACCURACY, RELEVANCE, TIMELINESS, AND COMPLETENESS AS IS NECESSARY TO ASSURE FAIRNESS IN ANY DETERMINATION RELATING TO THE QUALIFICATIONS, CHARACTER, RIGHTS, OR OPPORTUNITIES OF, OR BENEFITS TO THE INDIVIDUAL THAT MAY BE MADE ON THE ON THE BASIS**

OF SUCH RECORD, AND CONSEQUENTLY A DETERMINATION IS MADE  
WHICH IS ADVERSE THE INDIVIDUAL;

**(ADVERSELY AFFECT FEDERAL TITLE 18 U.S.C. 922 PROCEEDINGS)**

**WHERE DEFAMATORY STATEMENT WAS DURING FBI INVESTIGATION**

STATUTE OF LIMITATIONS FOR SLANDER BEGINS TO RUN, NOT WHEN  
DEFAMATORY STATEMENT WAS MADE, **BUT WHEN DAMAGE ARE**  
**ASCERTAINED** *THURSTON V BALLINGER 884 S.W.22d (MO, APP.W.D.)*

**THE PLAINTIFF IS ENTITLED TO DECLARATORY OR INJUNCTIVE  
RELIEF; SEE; BOLIN, 225 F 3d INJUNCTIVE RELIEFS CAN BE GRANTED  
WHEN (INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS)**

**THE CONSPIRACIES HAVE**  
**VIOLATED DECLARATORY DECREES OF**  
**THE CIRCUIT COURT BOONE COUNTY**  
**OF APRIL 11, 2020 AND APRIL 15, 2011;**

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**THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS**  
**HAS VIOLATED COURT ORDERS OF THE CIRCUIT COURT OF BOONE**  
**COUNTY, MISSOURI, FROM THE COURT OF JURISDICTION OVER THE**  
**MATTER OF MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY RECORDS**

IN CASE NUMBER: 11B7-MH00368-01.



**RECEIVED FROM COURT ORDER 11B7-MH00368-01 OF APRIL 11, 2011**

*IT IS FURTHER ORDER THAT THE HEAD OF UNIVERSITY MISSOURI PSYCHIATRIC CENTER MAKE AVAILABLE TO SAID ATTORNEY ALL INFORMATION AND RECORDS OF THE FACILITY CONCERNING THE RESPONDENT.*

***THE COURT WILL REVIEW THE RECORD IN THE LIGHT MOST FAVORABLE TO THE PARTY WHOM JUDGEMENT WAS ENTERED.***

*ITT COMMERCIAL FIN. CORP.V. MID AM. MARINE SUPPLY CORP., 854 S.W.2d 371, 376*

**ON APRIL 15, 2011 IN PATIENT CASE RECORD IDENTIFIERS;**

**# 122-88-33-6, # 11B7-MH00368-01,**

THE U.S. DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION, SUPERVISORY SENIOR RESIDENT AGENT, S. CODY ABRAM, REQUESTED A COPY OF JUDGE DANIELS CONFINEMENT ORDER IN REGARDS TO MR. MARK REYNOLDS.

***SEE; RSMO 630.140 THE COURT MAY IMPOSE SUCH RESTRICTIONS AS THE COURT DEEMS APPROPRIATE***

***THE COURT WILL REVIEW THE RECORD IN THE LIGHT MOST FAVORABLE TO THE PARTY WHOM JUDGEMENT WAS ENTERED.***

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*ITT COMMERCIAL FIN. CORP.V. MID AM. MARINE SUPPLY CORP., 854 S.W.2d  
371, 376*

**BY APRIL 15, 2011 THE RECORD WAS COMPLETELY VOIDED AND  
TOTALLY NULLIFIED BY THE COURT.**

**ON APRIL 15, 2011 IN PATIENT CASE RECORD IDENTIFIERS;**

**# 122-88-33-6, # 11B7-MH00368-01,**

**THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI**

**ORDER, COURT REVIEWS WRITTEN REQUEST TO ACCESS CONFIDENTIAL  
INFORMATION BASED ON SECTION 630.140 RSMO,**

**THE COURT FINDS NO SHOWING OF GOOD CAUSE TO RELEASE  
CONFIDENTIAL INFORMATION.**

**REQUEST FOR INFORMATION IS DENIED. DD/LJ**

JUDGEMENT OF JULY 12, 2012 WAS ENTERED THE ONLY ORDER WAS TO  
DIRECT MR. REYNOLDS TO SURRENDER HIS LICENSE CONTAINING A  
CONCEALED CARRY ENDORSEMENT. (TO THE COURT)

***THE COURT WILL REVIEW THE RECORD IN THE LIGHT MOST FAVORABLE  
TO THE PARTY WHOM JUDGEMENT WAS ENTERED.***

*ITT COMMERCIAL FIN. CORP.V. MID AM. MARINE SUPPLY CORP., 854 S.W.2d*  
*371, 376*

**1983 CONTEMPLATES DECLARATORY RELIEF;**

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**PLAINTIFF CLAIMS RIGHTS AND PRIVILEGES OF**

**A MALTREATED RSMO 565.184 VULNERABLE PERSON AND**

**ACTION STATUS OF PROTECTED CLASS**

PLAINTIFF IS SEEKING RELIEF FROM THE MUHC'S REFUSAL TO  
ACKNOWLEDGE THE DEPRIVATIONS OF MR. REYNOLDS' LIBERTIES;

PLAINTIFF IS SEEKING RELIEF FROM MUHC'S (*ONGOING AT THE PRESENT  
TIME*) BREACH OF PATIENT'S PRIVACY RIGHTS, CIVIL LIBERTIES AND  
CIVIL RIGHTS WITHIN TITLE 5 U.S.C. 552a RECORDS;

PLAINTIFF IS SEEKING JUDICIAL DECLARATORY, INJUNCTIVE AND  
EXPUNGEMENT RELIEF FROM THE MUHC'S LIBEL RECORDS USE OF MR.  
REYNOLDS' 42 C.R.F. PART 2 IDENTITIES DATA;

142. JUDICIAL REMEDIES AND PENALTIES FOR VIOLATING THE PRIVACY  
ACT.

TITLE 5 U.S.C. 702 RIGHT OF REVIEW A PERSON SUFFERING LEGAL WRONG  
BECAUSE OF MUHC AGENCY ACTIONS IN VIOLATIONS OF:

42 U.S.C. 290dd-3 CONFIDENTIALITY OF PATIENT RECORDS;

SEE; 42 U.S.C. A290ee-3 AND 42 U.S.C. A290dd-3 AND 42 C.F.R. PART 2

SEE; 42 U.S.C.A290ee-3(2) (c), 42 U.S.C. A290-dd-3(2) (c). AND 42 C.F.R A2.61

SEE; UNITED STATES V GRAHAM, 548 F. 2d 1302, 1314 (8<sup>TH</sup> CIR. 1977)

**IN FORMAL PROCEEDING TO ENFORCE PROVISIONS OF LAWS;** TITLE 42  
CFR PART 2, CRM 1872 CONFIDENTIALITY OF PATIENT RECORDS; **IN TITLE**  
**42 U.S.C. 1988-PROCEEDINGS IN VINDICATION OF CIVIL RIGHTS,** 42 U.S.C.  
PROVISION OF SECTIONS 1981, 1982, 1983, 1985, AND 42 U.S.C. 1988 CIVIL  
RIGHTS ACT 1866, 18 U.S.C. 241, THE PRIVACY ACT OF 1974, 5 U.S.C. 552a et  
seq., THE FREEDOM OF INFORMATION ACT 5 U.S.C. 552a et seq., THE FEDERAL  
DECLARATORY JUDGEMENT ACT, 28 U.S.C. 2201, 1361, PUBLIC LAW 110-180,  
TITLE 18 U.S.C. 249, PUBLIC LAW 110- 180, TITLE 18 U.S.C. SEC. 922, ETC.

610.140, 120 RSMO TITLE 42 CRF PART 2, TITLE 5 U.S.C. 552(a) (4) (B) FOIA  
PERMITS LAWSUIT FOR INJUNCTION EXPUNGEMENT RELIEF;

**INJURY IN FACT CAUSE OF ACTION**

**(THE MUHC PERSONS DEFENDANTS) CREATION OF TITLE 5 U.S.C. 552a  
IDENTIFIABLE RECORD OF (MR. REYNOLDS') TITLE 42 C.R.F. PART 2  
PATIENT IDENTITY DATA**

1. ***PLAINTIFF IS SUFFERING ONGOING LEGAL WRONGS BECAUSE OF;  
(THE MUHC AGENCY PERSONS ACTIONS), OF THE CREATION OF A TITLE 5  
U.S.C. 552a RECORD OF (MR. REYNOLDS') TITLE 42 C.R.F. PART 2 RECORDS,  
AND MUHC'S BREACH OF (MR. REYNOLDS') IDENTITY, DIAGNOSIS,  
PROGNOSIS, OR TREATMENT) OF CONFIDENTIALITY OF PATIENT A290dd-3  
RECORD***

RESULTING FROM (THE INDIVIDUALLY NAMED MUHC PERSONS  
DEFENDANTS) GROSS NEGLIGENCE OF THE STANDARDS OF PATIENT  
CARE REQUIRED BY LAW RESULTING FROM (THE INDIVIDUALLY NAMED  
MUHC PERSON DEFENDANTS) FAILURES TO PROTECT PRIVACY RIGHTS  
OF S.S.A. DISABLED WORKERS' COMPENSATION, PATIENT MARK P  
REYNOLDS, 9560 STATE RD O STEEDMAN, MO 65077, DIVISION OF  
WORKERS' COMPENSATION **INSURANCE NO: 0187309 10567 INJURY NO: 08-  
85172 INJURY DATE: 09-15-2008**



*THE EXAMPLE DHSS ATTORNEY GAVE MR. REYNOLDS: A MEDICAL RECORD,  
IS A MEDICAL RECORD, WHEREEVER IT ENDS UP, IT IS A MEDICAL  
RECORD MADE BY A DOCTOR.*

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**MR. REYNOLDS SPECIFICALLY DENIES**

**SPECIAL MATTERS OF IMMUNITIES TO MAKE MORE DEFINITE**  
**WITH SUPPORTING FACTS WITHIN THE PARTIES' KNOWLEDGE**

**SEE; THE SAID MISREPRESENTED ATTORNEYS' ANTICS ADMITTED**  
**ARE DELIBERATE TO MISLEAD THE COURT:**

**IN RSMO 172.020 THE STATE OF MISSOURI HAS DIVORCED**

**THE ENTITIES KNOWN AS THE UNIVERSITY OF MISSOURI**

**MU IS NO-LONGER A MISSOURI GOVERNMENT BODY**

**THE MU ENTITIES ARE (PERSONS) THAT HAS BEEN DIVORCED OF ANY**  
**OFFICIAL IMMUNITY OR SOVEREIGN IMMUNITY;**

**RULE 26 NO DISCOVERY;**

**RSMO 172.020 HAS INCORPORATED THE UNVERSITY OF MISSOURI AND**  
**ABANDONED ANY IMMUNITIES OF LAW; RSMO 537.610, 537.600**

**SEE: RSMO 172.020 THE CORPORATE NAME IS**

**“THE CURATORS OF THE UNIVERSITY OF MISSOURI”**

**AND BY THAT NAME SHALL HAVE PERPETUAL SUCCESSION, POWER TO  
SUE AND BE SUED, COMPLAIN AND DEFEND IN ALL COURTS;**

**WITHOUT DISCOVERY MR. REYNOLDS BELIEVES**

**MUHC PERSON DEFENDANTS HAS PURCHASED TORT LIABILITY  
INSURANCE AND STATUTORILY WAIVED ANY SOVEREIGN IMMUNITY  
UNDER RSMO 71.185, 537.610, 632.440**

**SEE; THE SAID MISREPRESENTED ATTORNEYS’ ANTICS ADMITTED**

**CITED LAW 632.440 RSMO IMMUNITY CONDICTION ENDS WITH  
, AT OR BEFORE THE END OF THE PERIOD FOR WHICH THE PERSON WAS  
ADMITTED OR DETAINED FOR EVALUATION OR TREATMENT SO LONG  
AS SUCH DUTIES WERE PERFORMED IN GOOD FAITH AND **WITHOUT  
GROSS NEGLIGENCE.****

**SEE; NELSON V CRANE NO. SC 87205 APRIL 11 2006**

**ANALYSIS/SUMMARIZED**

**THE STATUTORY TERMS “COMMITTED” AND “DETENTION” ARE NOT  
DEFINED IN CHAPTER 591 OR IN CHAPTER 632. ABENT STATUTORY**

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DEFINITIONS, THESE TERMS MUST BE INTERPRETED TO IF EACH REFERS TO A SEPARATE AND DISTINCT LEGAL STATUS.

RSMO 632.305.3 AUTHORIZES DETENTION FOR EVALUATION AND TREATMENT AT NO POINT DOES 632.305.3 EMPLOY THE TERM “COMMITTED” OR “COMMITMENT” THE STUTUTE ONLY AUTHORIZES “DETENTION”

ALL MUHC PERSON DEFENDANTS ARE (THE MUHC PERSONS) THAT HAS HAS CREATED AND IS MAINTAINING TITLE 5 U.S.C. 552a RECORDS THAT IDENTIFIES MR. REYNOLDS’ PATIENT # 122-88-33-6 IDENTITY OF CASE NUMBER: 11B7-MH000368-01.

(THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS) ARE (THE MU CURATORS’ INCORPORATED PERSONS) THAT HAS TITLE 5 U.S.C. SEC. 552a RECORDS ON MR. REYNOLDS HIMSELF THAT IS A TITLE 42 C.F.R. PART 2 AND TITLE 18 U.S.C. 245 FEDERALLY PROTECTED RECORDS.

AND (THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS) THAT HAS THE RECORD AND (THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS) ARE ASSERTING JUSTIFICATION FOR RELEASE, DISCLOSURE AND USE OF MR. REYNOLDS’ TITLE 42 CFR PART 2 PATIENT # 122-88-33-6 IDENTITY AND IDENTIFYING RECORDS CASE NUMBER: 11B7-MH00368-01 AND OF;

MR. REYNOLDS’ PROTECTED HEALTHCARE INFORMATION REFER TO HEREIN AS (“PHI”) AND



MR. REYNOLDS' IDENTIFYING HEALTHCARE INFORMATION

REFER TO HEREIN AS ("IHI")

THIS IS NOT PERMITTED BY REGULATIONS.

(THE INDIVIDUALLY NAMED MUHC PERSONS DEFENDANTS) IS IDENTIFYING MR. REYNOLDS PATIENT # 122-88-33-6 AS A PERSON WHO HAS BEEN ADJUDICATED AS A MENTAL DEFECTIVE OR WHO HAS BEEN FORMALLY AND INVOLUNTARY COMMITTED TO ANY MENTAL INSTITUTION IN MUHC 5 U.S.C. SEC. 552a RECORDS ON MR. REYNOLDS HIMSELF.

SEE; TITLE 18 U.S.C. SEC. 922 SEC.102 (C) (iv)

SEE; 42 CFR A2.13 CONFIDENTIALITY RESTRICTIONS

THE RECORDS OF MR. REYNOLDS' PATIENT # 122-88-33-6 IDENTITY IS PROTECTED FROM DISCLOSURE TO THE ATTORNEY GENERAL BY FEDERAL AND STATE LAW AND A STATE COURT ORDER.

SEE; 290dd-3 (C) (c) PROHIBITION AGAINST USE OF RECORD IN MAKING CRIMINAL CHARGES OR INVESTIGATION OF PATIENT..... NO RECORD REFERRED IN SUBSECTION (a) OF THIS SECTION MAY BE USED TO INITIATE OR SUBSTANTIATE ANY CRIMINAL CHARGES AGAINST A PATIENT OR TO CONDUCT ANY INVESTIGATION OF A PATIENT.

42 CFR A6.1, SUBPART E COURT ORDERS AUTHORIZING DISCLOSURE AND USE

MR. REYNOLDS SPECIFICALLY DENIES

SPECIAL MATTERS OF THE SERVICE UPON

THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS



**TO MAKE MORE DEFINITE**

**WITH SUPPORTING FACTS WITHIN THE PARTIES' KNOWLEDGE**

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**MR. REYNOLDS' SERVICE WAS PROPERLY SERVED UPON**

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**MU INCORPORATED PERSONS-REGISTERED AGENT STEPHEN J OWENS**

STEPHEN J OWENS WAS GIVEN TO MR. REYNOLDS

AS THE REGISTERED AGENT OF (THE MUHC PERSONS DEFENDANTS)

BY JONATHAN CURTRIGHT'S OFFICE AT: ONE HOSPITAL DRIVE

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**SEE; THE SAID MISREPRESENTED ATTORNEYS' ANTICS ADMITTED**

COLLATERAL ATTACKS AGAINST THE OPEN RECORDS LAWS AND

AGAINST MR. REYNOLDS LAWFUL RECORDS REQUEST COMPLAINT

**RULE 26 NO DISCOVERY;**

**RSMO 172.020 THE MISSOURI UNIVERSITY HAS INCORPORATED AS ITS**

**OWN CORPORATE (PERSONS); 537.600 RSMO**

**MUHC PERSON DEFENDANTS**

**ARE**

**"THE CURATORS OF THE UNVERISITY OF MISSOURI"**

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**INCORPORATED “PERSONS” OF RSMO 172.020**

MR.REYNOLDS’ CITES; 42 U.S.C. 1981. EQUAL RIGHTS UNDER LAW (a)  
STATEMENT OF EQUAL RIGHTS

(C) PROTECT AGAINST IMPAIRMENT

*THE RIGHTS PROTECTED BY THIS SECTION ARE PROTECTED AGAINST  
IMPAIRMENT BY NONGOVERNMENTAL DISCRIMINATION AND IMPAIRMENT  
UNDER COLOR OF LAW,*

**RSMO 1.020 (11) THE WORD “PERSON” MAY EXTEND AND BE APPLIED TO  
(BODIES POLITIC) AND (CORPORATE), AND TO PARTNERSHIPS AND  
OTHER UNINCORPORATED ASSOCIATIONS;**

**THE CORPORATE NAME IS**

**“THE CURATORS OF THE UNIVERSITY OF MISSOURI**

*WHICH REFERS TO THE INSTITUTION, IN ALL OF ITS PARTS, PERSONS,  
PROPERTY AND RELATIONSHIPS WHERE SITUATED, OWNED, OPERATED,  
CONTROLLED, MANAGED OR OTHERWISE REGULATED, IS UNDER THE  
SUPERVISION OR DIRECTION OF THE BOARD OF CURATORS OF THE  
UNIVERSITY OF MISSOURI;*

THE SAID MISREPRESENTED ATTORNEYS' AND LAW FIRM ARE ENTERING  
THEIR APPEARANCES ON BEHALF OF PERSONS;

**THAT ARE NOT NAME PERSON DEFENDANTS IN THE COMPLAINT;**

*SEE; PAGES 31, 32 OF 50 OF MR. REYNOLDS' COMPLAINT*

*THE 6 INDIVIDUALS OF THE BOARD OF CURATORS ARE PERSONS;*

*THE UNIVERSITY OF MISSOURI BOARD OF CURATORS IS A PERSON;*

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**SEE; THE SAID MISREPRESENTED ATTORNEYS' ANTICS ADMITTED**

**ARE DELIBERATE TO MISLEAD THE COURT:**

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**SEE; RSMO 1.020 (11) THE WORD "PERSON" MAY EXTEND AND BE  
APPLIED TO (BODIES POLITIC) AND (CORPORATE), AND TO  
PARTNERSHIPS AND OTHER UNINCORPORATED ASSOCIATIONS;**

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**RULE 26 NO DISCOVERY; (MUST USE IN FULL)**

**SEE; "THE CURATORS OF THE UNIVERSITY OF MISSOURI"**

*WHICH REFERS TO THE INSTITUTION, IN ALL OF ITS PARTS, PERSONS,  
PROPERTY AND RELATIONSHIPS WHERE SITUATED, OWNED, OPERATED,  
CONTROLLED, MANAGED OR OTHERWISE REGULATED, IS UNDER THE  
SUPERVISION OR DIRECTION OF THE BOARD OF CURATORS OF THE  
UNIVERSITY OF MISSOURI;*

**(MUST USE IN FULL) SEE: RSMO 172.020 THE CORPORATE NAME IS**

**“THE CURATORS OF THE UNIVERSITY OF MISSOURI”**

AND BY THAT NAME SHALL HAVE **PERPETUAL SUCCESSION**, POWER TO  
**SUE AND BE SUED**, COMPLAIN AND DEFEND IN ALL COURTS;

**RULE 26 NO DISCOVERY; (MUST USE IN FULL)**

**RSMO 172.020 HAS INCORPORATED** THE UNIVERSITY OF MISSOURI AND  
ABANDONED ANY IMMUNITIES OF LAW; 537.610, 537.600 RSMO

**TO BE MORE DEFINITE SEE; THE SAID MISREPRESENTED ATTORNEYS’  
ANTICS ADMITTED ARE NOT REPERSENTING (THE MUHC PERSONS  
DEFENDANTS)? “THE MU CURATORS INCORPORATED PERSONS”?**

**SEE; THE SAID MISREPRESENTED ATTORNEYS’ ANTICS ADMITTED**

**MOTION TO QUASH SERVICE**

***ARE NOT REPRESENTING (THE MUHC PERSONS DEFENDANTS)?***

**“THE MU CURATORS INCORPORATED PERSONS”?**



IN VIOLATIONS OF THE CONFIDENTIALITY OF PATIENT RECORDS  
CRIMINAL RESOURCE MANUAL 1872 42 U.S.C. A290ee-3, 42 U.S.C. A290dd-3

AND 42 C.F.R. A2.61et seq.

UNITED STATES V GRAHAM, 548 F.2d 1302, 1314 (8<sup>TH</sup> CIR. 1977)

THE INDIVIDUALLY NAMED MUHC “**INCORPORATED PERSON**”

DEFENDANTS IS DOMICILED

**AT:** ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212

TO MAKE MORE DEFINITE SEE; **THE FOLLOWING STATEMENTS THAT  
ARE NOT CLEARLY UNDERSTOOD TO SAID ATTORNEYS;**

1. **DEFENDANT, MU HEALTH CARE HEREIN REFERRED TO AS (“MUHC”)**

**AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212**

**REGISTERED AGENT FOR THE DEFENDANT IS: STEPHEN J. OWENS**

**AT: 227 UNIVERSITY HALL COLUMBIA, MO 65211**

THE DEFENDANT MUHC ARE (FBI TASKFORCE PARTICIPANTS WITH  
TITLE 5 U.S.C. 552a RESPONSIVE RECORDS) AGENCIES AND AGENTS OF  
“STATE AND LOCAL ORGANIZATIONS”

**THAT RECEIVES FEDERAL FUNDS;**

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**DEFENDANT: MUHC AGENCY AND COMPONENTS ARE WITHIN THE  
MEANING OF 5 U.S.C. 552a (a) (1),**

**AND IS IN POSSESSION AND/OR CONTROL OF RECORDS PERTAINING TO  
PLANTIFF, MARK PAUL REYNOLDS.**

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**2. DEFEENDANT: UNIVERITY HOSPITAL MEDICAL RECORDS,**

**AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212**

**3. DEFENDANT: M.U. UNIVERSITY HOSPITOL,**

**AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212**

**4. DEFENDANT: UNIVERSITY OF MISSOURI HEALTH SYSTEM**

**AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212**

**5. DEFENDANT: UNIVERSITY OF MISSOURI PHYCHIATIC CENTER**

**AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212**

<p><b>TO MAKE MORE DEFINITE SEE; THE SAID MISREPRESENTED ATTORNEYS ANTICS ADMITTED ARE NOT REPERSENTING (THE MUHC PERSON DEFENDANTS)? “THE MU CURATORS’ INCORPORATED PERSONS”?</b></p>
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**DEFENDANT, MU HEALTH CARE HEREIN REFERRED TO AS (“MUHC”)**

**AT: ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212**

**REGISTERED AGENT FOR THE DEFENDANT IS: STEPHEN J. OWENS**

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THE DEFENDANT MUHC ARE (FBI TASKFORCE PARTICIPANTS WITH  
TITLE 5 U.S.C. 552a RESPONSIVE RECORDS) AGENCIES AND AGENTS OF  
“STATE AND LOCAL ORGANIZATIONS”

**THAT RECEIVES FEDERAL FUNDS;**

---

**DEFENDANT: MUHC AGENCY AND COMPONENTS ARE WITHIN THE**  
MEANING OF 5 U.S.C. 552a (a) (1),

**AND IS IN POSSESSION AND/OR CONTROL OF RECORDS PERTAINING TO**  
**PLANTIFF, MARK PAUL REYNOLDS.**

6. **DEFENDANT: JONATHAN CURTRIGHT, MUHC, CEO**

AND THE SUBSTITUTE FOR PREDECESSOR, MITCH WASDEN

**AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212**

7. **DEFENDANT: TALLEY MILLER, MEDICAL RECORDS TECH- IV**

**AT: ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212**

8. **DEFENDANT: KATHARINE S BUNN, COUSNSEL**

**AT: OFFICE OF THE GENERAL COUNSEL**

**227 UNVERSTY HALL COLUMBIA, MO 65211**

9. **DEFENDANT: RONA BIELE, EXECUTIVE STAFF ASSISTANT**

**GUEST SERVICES REPRESENTATIVE MISSOURI PSHYCHIATRIC CENTER**

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

**10. DEFENDANT:** MUHAMMAD WAQAR SALAM, MD

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

**11. DEFENDANT:** MOHIT BHARDWAJ, MD, UMPC DOCTOR PETITIONER

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

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**12. DEFENDANT:** SUZANNE M KING, MD

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

**13. DEFENDANT:** AMY C BANTZ, SOCIAL WORKER,

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

**14. DEFENDANT:** ALLEN LAVENDER, RESIDENT

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

**15. RUTH E MEYER, RN**

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65

**16. DEFENDANT:** KISTIN E HAHN-COVER, MD

**AT:** ONE HOSPITAL DRIVE DC0042.00 COLUMBIA, MO 65212

**17. DEFENDANT:** JOHN YANOS, MD

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

**18. DEFENDANT:** JASON SHOEMAKER, MD

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

**19. DEFENDANT:** SETIA SABEENA, MD

**AT:** ONE HOSPITAL DRIVE DC0042.00 COLUMBIA, MO 65212

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20. **DEFENDANT:** SHIRLEY J SMITH

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

21. **DEFENDANT:** ASHLEY HOLMAN

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

22. **DEFENDANT:** PEGGY A FORD

**AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

23. **DEFENDANT:** NICOLE E. EPSTEIN, JD, MHA, MUHC SYSTEM PRIVACY OFFICER, **AT:** ONE HOSPITAL DRIVE, DC0042.00 COLUMBIA, MO 65212

**MR. REYNOLDS' SPECIFIC RESPONSES TO**

**MU CORPORATE ATTORNEYS' MOTIONS TO DISMISS**

**(OF) THE FAILURES OF THE MOTIONS TO COMPLY WITH F.R.C.P.**

**(OF) ON THE BEHALF "PERSONS" FILING PLEADINGS AND MOTIONS**

**(OF) "INTERRING PARTIES" MISLEADING OF THE U.S. DISTRICT COURT;**

**(OF) THE INTERFERRING "PERSONS" NOT NAMED IN THE CIVIL ACTIONS;**

**(OF) THE MU CURATORS' "PERSON ENTITY'S" ATTORNEYS' MOTIONS;**

**(OF) "THE MU CURATORS BOARD" OR "ITS PERSON ENTITY**

**(OF) THE MU CORPORATE ATTORNEYS' MOTIONS TO DISMISS**

**(OF) "PERSONS" INTERFERRING FROM OUTSIDE OF THE CIVIL ACTIONS;**

Page 29 of 37

(OF) (THE PURPORTED UNIVERSITY OF MISSOURI ENTITIES MOTIONS)

(OF) (THE INDIVIDUALLY MUHC PERSONS DEFENDANTS' MOTIONS)

**SPECIFIC RULE 9 RESPONSES: IN THE SPECIAL MATTERS OF THE MUHC DEFENDANTS IN TITLE 5 U.S.C. SEC. 552a (PRIVACY ACT- IMPROPER DISSEMINATION) WITHOUT OBSERVANCE OF PROCEDURES REQUIRED BY LAW; MR. REYNOLDS CAN NOT PROPERLY RESPONSE; CITING RULE 26 DISCOVERY IS REQUIRED AND NEEDED TO PROPERLY RESPOND;**

**THE SAID MISREPRESENTED ATTORNEYS ANTICS ADMITTED**

**ARE ATTEMPTING TO TRY THIS CASE BY MOTION TO DISMISS;**

**THEREFORE; THE PLAINTIFF'S PRAY FOR THE COURT TO GRANT HIS MOTION FOR DEFAULT JUDGEMENT** *THE SAID ATTORNEYS AND LAW FIRM ARE ENTERING THEIR APPEARANCES ON BEHALF OF PERSONS;*

*THAT ARE NOT INDIVIDUALLY NAME PERSON DEFENDANTS*

*NAMED IN THE CIVIL COMPLAINT THEREFORE NOT PARTY CIVIL ACTION;*

**THE SAID ATTORNEYS AND LAW FIRM HAVE FAILED TO ENTER THEIR FILINGS AND APPEARANCES ON BEHALF OF; "THE INDIVIDUALLY NAMED PERSON DEFENDANTS" NAMED IN THE CIVIL COMPLAINT;**

**IN TIMELY MANNER SEE; F.R.C.P.**

**AND/OR IN THE ALTERNATIVE:** THE PLAINTIFF PRAYS FOR THE COURT TO GRANT HIS MOTION FOR SANCTIONS AGAINST SAID ATTORNEYS FOR HARASSMENT OF THE PLAINTIFF AND FOR THE DELIBERATE MISLEADING OF THE U.S. DISTRICT COURT.

**AND/OR IN THE ALTERNATIVE:**

THE PLAINTIFF PRAYS FOR COURT RELIEF FROM THE HARASSMENTS BY CORPORATE PERSONS ENTITIES THAT ARE NOT INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS IN CIVIL COMPLAINT THEREFORE NOT PARTY TO CIVIL ACTION **WITH;**

**THE DENYING OF THE SAID ATTORNEYS' (MOTIONS TO DISMISS) AND;**

**DENYING THE INDIVIDUALLY NAME MUHC PERSON DEFENDANTS':**

MOTION TO QUASH SERVICE;

**DENYING THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS':**

MOTION TO DISMISS;

**DENYING THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS':**

MOTION IN THE ALTERNATIVE TO MAKE MORE DEFINITE;

**DENYING THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS':**

SUGGESTION IN SUPPORT OF;



**DENYING THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS’:**

MOTION TO DISMISS;

**DENYING THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS’:**

THE PURPORTED UNIVERSITY OF MISSOURI ENTITIES;

**DENYING THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS’:**

ALTERNATIVE MOTION FOR A MORE DEFINITE STATEMENT;

**DENYING THE INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS’:**

SUGGESTION IN SUPPORT OF;

**AND/OR IN THE ALTERNATIVE:** PROCEED WITH THE RULE 26 DISCOVERY  
CONFERENCES FOR MORE CLARIFICATIONS OF VIOLATIONS OF MR.  
REYNOLDS PRIVACY RIGHTS BY “NOW KNOWN” MU INCORPORATED  
INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS

PRODUCTION OF DOCUMENTS; USE OF MARK PAUL REYNOLDS IDENTITY;

**WHERE DEFAMATORY STATEMENT WAS DURING FBI INVESTIGATION**

**STATUTE OF LIMITATIONS FOR SLANDER BEGINS TO RUN, NOT WHEN**  
DEFAMATORY STATEMENT WAS MADE, BUT WHEN DAMAGE ARE  
ASCERTAINED; *THURSTON V BALLINGER 884 S.W.22d (MO, APP.W.D.)*



**RULE 26 PRODUCTIONS OF THE INCORPORATED INDIVIDUALLY MUHC  
PERSONS DEFENDANTS ADMINISTRATIVE CENTER RECORDS;**

**DOMICILED AT:** ONE HOSPITAL DRIVE, DC042.00 COLUMBIA, MO 65212

**RULE 26 PRODUCTIONS OF DOCUMENTS OF;**

ANY AND ALL USE OF MARK PAUL REYNOLDS INDENTITY

BY THE MU INCORPORATED

INDIVIDUALLY NAMED MUHC PERSON DEFENDANTS

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**PLAINTIFF CLAIMS RIGHTS AND PRIVILEGES OF**

**A MALTREATED RSMO 565.184 VULNERABLE PERSON AND**

**ACTION STATUS OF PROTECTED CLASS**

PLAINTIFF IS SEEKING RELIEF FROM THE MUHC'S REFUSAL TO  
ACKNOWLEDGE THE DEPRIVATIONS OF MR. REYNOLDS' LIBERTIES;

PLAINTIFF IS SEEKING RELIEF FROM MUHC'S (*ONGOING AT THE PRESENT  
TIME*) BREACH OF PATIENT'S PRIVACY RIGHTS, CIVIL LIBERTIES AND  
CIVIL RIGHTS WITHIN TITLE 5 U.S.C. 552a RECORDS;

PLAINTIFF IS SEEKING JUDICIAL DECLARATORY, INJUNCTIVE AND  
EXPUNGEMENT RELIEF FROM THE MUHC'S LIBEL RECORDS USE OF MR.  
REYNOLDS' 42 C.R.F. PART 2 IDENTITIES DATA;

**CHAPTER 151 DECLARATORY JUDGEMENTS**

***ANY SUCH DECLARATION SHALL HAVE THE FORCE AND EFFECT OF A FINAL JUDGEMENT DECREE AND SHALL BE REVIEWEDABLE AS SUCH.***

SEE; TITLE 42 CFR (PART 2) AND 2.13 (A)..... MAY NOT OTHERWISE BE DISCLOSED OR USED IN ANY CIVIL, CRIMINAL, ADMINISTRATIVE, OR LEGISLATIVE PROCEEDINGS CONDUCTED BY ANY FEDERAL, STATE, OR LOCAL AUTHORITY...; AND (b) UNCONDITIONAL COMPLIANCE REQUIRED: (C) ACKNOWLEDGING THE PRESENCE OF PATIENTS:

142. JUDICIAL REMEDIES AND PENALTIES FOR VIOLATING THE PRIVACY ACT.

TITLE 5 U.S.C. 702 RIGHT OF REVIEW A PERSON SUFFERING LEGAL WRONG BECAUSE OF MUHC AGENCY ACTIONS IN VIOLATIONS OF:

42 U.S.C. 290dd-3 CONFIDENTIALITY OF PATIENT RECORDS;

SEE; 42 U.S.C. A290ee-3 AND 42 U.S.C. A290dd-3 AND 42 C.F.R. PART 2

SEE; 42 U.S.C.A290ee-3(2) (c), 42 U.S.C. A290-dd-3(2) (c). AND 42 C.F.R A2.61

SEE; UNITED STATES V GRAHAM, 548 F. 2d 1302, 1314 (8<sup>TH</sup> CIR. 1977)

**IN FORMAL PROCEEDING TO ENFORCE PROVISIONS OF LAWS; TITLE 42 CFR PART 2, CRM 1872 CONFIDENTIALITY OF PATIENT RECORDS; IN TITLE**

**42 U.S.C. 1988-PROCEEDINGS IN VINDICATION OF CIVIL RIGHTS**, 42 U.S.C. PROVISION OF SECTIONS 1981, 1982, 1983, 1985, AND 42 U.S.C. 1988 CIVIL RIGHTS ACT 1866, 18 U.S.C. 241, THE PRIVACY ACT OF 1974, 5 U.S.C. 552a et seq., THE FREEDOM OF INFORMATION ACT 5 U.S.C. 552a et seq., THE FEDERAL DECLARATORY JUDGEMENT ACT, 28 U.S.C. 2201, 1361, PUBLIC LAW 110-180, TITLE 18 U.S.C. 249, PUBLIC LAW 110- 180, TITLE 18 U.S.C. SEC. 922, ETC.

610.140, 120 RSMO TITLE 42 CRF PART 2, TITLE 5 U.S.C. 552(a) (4) (B) FOIA PERMITS LAWSUIT FOR INJUNCTION EXPUNGEMENT RELIEF;

**AND/OR IN THE ALTERNATIVE:** FOR THE COURT TO GRANT ANY RELIEF THE COURT SEE AS JUST AND PROPER;

**ALL PERSONS SHALL HAVE THE RIGHT TO HUNT**, FISH AND TRAP IN THIS STATE IN ACCORDANCE WITH LAW AND THE RULES AND REGULATIONS MADE BY THE COMMISSION AS ESTABLISHED IN ACTICLE IV OF THE CONSTITUTION OF MISSOURI;

JUDICIAL REVIEW OF TITLE 5 U.S.C. SEC.552a RECORDS IS LIKELY TO BRING RELIEF WITH EXPUNGEMENT OF THE MUHC'S TITLE 5 U.S.C. SEC. 552a RECORDS AND THEIR ADVERSE AND HARMFUL AFFECTS UPON MR. REYNOLDS THAT IS CONTINUING TO CAUSE MR. REYNOLDS TO SUFFER UNJUSTIFIABLE PUNISHMENTS, PAINS AND FINANCIAL HARDSHIPS

INCLUDING, BUT NOT LIMITED TO, MENTAL DISTRESS, EMOTIONAL TRAUMA, EMBARRASSMENT, HUMILIATION, AND LOST OR JEOPARDIZED PRESENT OR FUTURE FINANCIAL OPPORTUNITIES.

RESPECTFULLY SUBMITTED

*Mark P Reynolds 7/1/2020*

MARK P REYNOLDS, PROSE,

9560 STATE ROAD O,

STEEDMAN, MO 65077-1310



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CERTIFICATE OF SERVICE

I MARK P REYNOLDS HEREBY CERTIFIES A COPY OF THE FOREGOING  
INSTRUMENT WAS FILED BY SELF HAND DELIVERY;

AT: U.S. DISTRICT COURT CLERK'S OFFICE,

---

80 LAFAYETE STREET JEFFERSON CITY MISSOURI 65101

AND COPY WAS MAILED VIA U.S. POSTAL SERVICE;

**AND TO THE ATTENTION OF: STEPHEN J. OWENS**

REGISTERED AGENT FOR THE MUHC DEFENDANTS

AT: 227 UNIVERSITY HALL COLUMBIA, MO 65211

ON THIS DAY OF: 7/1/2020

Mark P Reynolds 7/1/2020  
MARK P REYNOLDS

9560 STATE ROAD O, STEEDMAN, MISSOURI 65077-1310 USA